

# Exhibit III

**IN THE UNITED STATES DISTRICT COURT FOR THE  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

|                                   |   |                           |
|-----------------------------------|---|---------------------------|
| THOMAS SIERRA,                    | ) |                           |
|                                   | ) | Case No. 18 CV 3029       |
| <i>Plaintiff,</i>                 | ) |                           |
|                                   | ) |                           |
| v.                                | ) |                           |
|                                   | ) |                           |
| REYNALDO GUEVARA, ERNEST          | ) | Judge John Robert Blakey, |
| HALVORSEN, ANTHONY WOJCIK, JOHN   | ) | District Judge            |
| McMURRAY, GEORGE FIGUEROA,        | ) |                           |
| EDWARD MINGEY, ROBERT BIEBEL,     | ) | Judge M. David Weisman,   |
| FRANCIS CAPPITELLI, UNKNOWN       | ) | District Judge            |
| EMPLOYEES OF THE CITY OF          | ) |                           |
| CHICAGO, and the CITY OF CHICAGO, | ) | JURY TRIAL DEMANDED       |
| Illinois,                         | ) |                           |
|                                   | ) |                           |
| <i>Defendants.</i>                | ) |                           |
|                                   | ) |                           |

**DEFENDANTS' RULE 26(a)(2) DISCLOSURE**

Defendants City of Chicago (“City”), Reynaldo Guevara, Anthony Wojcik, John McMurray, George Figueroa, Edward Mingey, Robert Biebel, and JoAnn Halvorsen as special representative of Ernest Halvorsen (deceased) (“Defendant Officers”) (collectively referred to as “City Defendants”), by and through their respective undersigned attorneys, submit the below Fed. R. Civ. P. 26(a)(2) disclosures.

**Retained Experts Designated Under Rule 26(a)(2)(B)**

Each of the following may be called as a retained expert to present evidence at trial under Federal Rules of Evidence 702, 703, or 705, consistent with each individual’s respective signed report attached to this disclosure.

1. Dr. Nelson Andreu: Dr. Andreu’s CV, list of publications, rate of compensation, and past testimony are included in his disclosure.
2. John Wixted, Ph.D.: Dr. Wixted’s curriculum vitae, list of publications, rate of compensation, and past testimony are included in his disclosure. Pursuant to the agreement of the parties, Dr. Wixted’s signed combined report rebutting Plaintiff’s expert, Dr. Nancy

Stebly addressing certain City of Chicago policies and practices will be produced on April 3, 2023.

3. Dr. Lior Gideon: Dr. Gideon's CV, list of publications, rate of compensation and past testimony are included in his disclosure.
4. Bernard Murray: Mr. Murray's CV, rate of compensation and past testimony are included in his disclosure.

**Non-Retained Experts Designated Under Rule 26(a)(2)(C):**

1. **William P. Farrell**, former Assistant State's Attorney, may be contacted through his counsel Mr. Mathias Lydon, Law Office of Mathias Lydon, 1040 North State Parkway, Chicago, Illinois 60610.

Mr. Farrell, may present evidence at trial under Federal Rules of Evidence 702, 703, or 705 consistent with his November 20, 2021 deposition, his prior testimony during Plaintiff's underlying criminal proceedings, relevant case files, and other documents disclosed in this case. Mr. Farrell may testify regarding the following subject matters: his education, training, and experience as an assistant state's attorney, the considerations in approving charges as a felony review assistant state's attorney, and his involvement in the approval of felony charges against Thomas Sierra, including but not limited to any reports he authored or assisted in authoring and statements taken. More specifically, Mr. Farrell may be called to testify:

- The State's Attorney's Office controls the decision on whether or not to approve felony charges.
  - There was probable cause to arrest and charge Mr. Sierra for the 1995 murder of Noel Andujar.
  - Mr. Farrell prepared the handwritten statement of Mr. Melendez and any suggestion that he didn't participated in an interview of Mr. Melendez, the drafting of his statement, and later signing of his statement is untrue.
2. **Joseph Alesia**, former Assistant State's Attorney, may be contacted through his counsel Mr. James Lydon, Hinshaw & Culbertson, LLP, 222 North LaSalle Street, Suite 300, Chicago, Illinois 60601

Mr. Alesia, may present evidence at trial under Federal Rules of Evidence 702, 703, or 705 consistent with his September 13, 2021 deposition, relevant case files, and other documents disclosed in this case. Mr. Alesia may testify regarding the following subject matters: his education, training, and experience as an assistant state's attorney, the considerations in approving charges as a felony review assistant state's attorney, and his involvement in the prosecution of Thomas Sierra for the 1995 murder of Noel Andujar. More specifically, Mr. Alesia may be called to testify:

- Prosecutors have an ethical responsibility to seek justice, not merely a conviction.

- He and Ms. Patricia Sudendorf exercised their own independent judgment and based upon a review of records, determined to prosecute Mr. Sierra for the murder of Noel Andujar.
- Felony Review evaluated all of the evidence that was presented to them and then made a decision on charging.

Date: March 27, 2023

Respectfully submitted,

by: /s/ Eileen E. Rosen

Eileen E. Rosen  
Special Assistant Corporation Counsel  
One of the Attorneys for City of Chicago

/s/ Josh M. Engquist

Josh M. Engquist  
Special Assistant Corporation Counsel  
One of the Attorneys for Defendant Officers

Eileen E. Rosen  
Catherine M. Barber  
Theresa B. Carney  
Austin G. Rahe  
Rock Fusco & Connelly, LLC  
333 W. Wacker, 19th Floor  
Chicago, Illinois 60606  
(312) 474-1000  
[erosen@rfclaw.com](mailto:erosen@rfclaw.com)

James G. Sotos  
Josh M. Engquist  
Jeffrey R. Kivetz  
David A. Brueggen  
Elizabeth R. Fleming  
The Sotos Law Firm, P.C.  
141 W. Jackson, Suite 1240A  
Chicago, Illinois 60604  
(630) 735-3300  
[jengquist@sotoslaw.com](mailto:jengquist@sotoslaw.com)

/s/ Megan K. McGrath

Megan K. McGrath  
Special Assistant Corporation Counsel  
One of the Attorneys for Reynaldo Guevara

Thomas M. Leinenweber  
James V. Daffada  
Megan K. McGrath  
Leinenweber Baroni & Daffada, LLC  
120 N. LaSalle Street, Suite 200  
Chicago, Illinois 60602  
(847) 251-4091  
[mkm@ilesq.com](mailto:mkm@ilesq.com)

**CERTIFICATE OF SERVICE**

I, Josh Engquist, an attorney, certify that on March 27, 2023, I served the foregoing Rule 26(a)(2) disclosures on all counsel of record using electronic mail.

/s/ Josh M. Engquist